Remarks

Reconsideration and reversal of the rejections expressed in the Office Action of July 6, 2006 are respectfully contended in view of the following remarks and the application as amended. The present invention relates to a method for the cleaning of an integrated circuit substrate, comprising contacting the integrated circuit substrate with a combination of (a) hydrogen fluoride and (b) a mixture of hydrogen peroxide with a compound selected from the group consisting of ammonium hydroxide, hydrochloric acid and sulfuric acid.

Claims 1-13, 15 and 17-18 were rejected under 35 U.S.C. §112, second paragraph. The claims have been clarified to overcome this rejection.

Claims 1, 3, 4 and 8-9 were rejected under 35 U.S.C. §102(e) as anticipated by Park et al. (US 2003/0235947). Park et al. relates to a method for fabricating a capacitor in a semiconductor device, and more particularly, to a method for fabricating a capacitor capable of stably forming a nitride layer on a lower electrode and obtaining improvements on stable capacitance and leakage current characteristics. The claims as clarified overcome this rejection. Note also that all discussions of temperature conditions in Park et al. specify a temperature of 200° C and higher. In contrast, the present invention as disclosed and claimed in certain claims specifies that cleaning comprises contacting the integrated circuit substrate with the aqueous cleaning composition at a temperature from about 15° C to about 90° C. Indeed, there is no teaching or suggestion in Park et al. that such lower temperature treatment ranges would be effective. Therefore, this rejection is overcome.

Claims 1-6, 8-13, 15 and 17-18 were rejected under 35 U.S.C. §102(e) as being anticipated by Barnett et al. (US 2005/0070120), while claims 1, 2 and 7-9 were rejected under 35 U.S.C. §102(e) as being anticipated by Brask et al. (US 2005/0048794). In order to enhance the prosecution of the present application, enclosed with this Amendment and Response is a Declaration under 37 CFR 1.131, which establishes that the present invention was reduced to practice prior to the August 28, 2003 filing dates of each reference. Therefore, these rejections are overcome as well.

For all of the above reasons, it is respectfully contended that the solicited claims define patentable subject matter. Reconsideration and reversal of the rejections expressed in the Office

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Action of July 6, 2006 are respectfully submitted. The Examiner is invited to call the undersigned if any questions arise during the course of reconsideration of this matter.

Respectfully submitted,

Date: $\frac{11/3/06}{}$

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